

REMARKS

Status of claims

Claims 1-35 are pending in this reissue application.

Amendments to the claims are made with respect to the original issued patent.

Explanation of amendments

Claims 25, 27, 29, 31, 33 and 35 have been amended by replacing the phrase "wherein the money handling apparatus is adapted for returning change" with "wherein the money handling apparatus is operable to return change."

Information Disclosure Statement ("IDS")

The Office action states that the copy of item "AS" (*i.e.*, National Rejectors, Inc. GmbH "Manual for Changer Series G-26.4000") of the IDS submitted on August 28, 2006, did not include pages 66 and 67.

The undersigned attorney is still trying to obtain copies of the missing pages and will submit them to the Examiner as soon as copies can be obtained.

The Office action also noted that copies of the following two additional documents were enclosed, but were not listed on the form 1449:

- (1) "NRI Changer Series G-26.4000 Appendix" (10 pages), and
- (2) "NRI New Changer Series G-26.4000/6" (15 pages).

Enclosed is a form 1449 listing those items of information. As the Office action states that the items have been placed in the file of record, applicant is not submitting additional copies. However, applicant requests that the Examiner let the undersigned attorney know if additional copies are needed. The listed items appear to be dated, respectively, June 1993 and August 1993, based on the data in the lower left-hand corner of the first page of each document.

Rejections under 35 U.S.C. §112, par 2

(1) The Office action rejected claims 1-6 and 24-25 as indefinite under section 112, par. 2 because of alleged lack of clarity. In particular, the office action states:

Claim 1 recites the terms “device for handling money (in the preamble – line 1), “money handling apparatus” (in the body – line 2), “further device for handling money” (in the body – line 6), and “first and second different types of device for handling money” (in the body – lines 10 and 11). It appears that the ‘device for handling money’ is an element of the claim that belongs in the body of the claim. Furthermore, it is unclear whether said “device for handling money is one of the first and second types of device for handling money”. Still further, it is unclear whether the “money handling apparatus” is one of the “first and second different types of device for handling money”.

Applicant respectfully disagrees with the rejection. To facilitate understanding of the claimed subject matter, an example based on FIGs. 1 and 2 is discussed in the following paragraph.

Claim 1 recites a device for handling money. The money handling device includes a money handling apparatus (*e.g.*, the coin changer 110) and an internal controller (*e.g.*, microcontroller 400) for controlling the money handling apparatus.

The money handling device of claim 1 also includes first and second ports (*e.g.*, ports P1 and P2). The first port (*e.g.*, port P1) is for removable connection to an external controller (*e.g.*, vending machine controller 130) for communication with the internal controller (*e.g.*, microcontroller 400). The second port (*e.g.*, port P2) is for removable connection to a further device for handling money (*e.g.*, device 70, 100 or 105).

According to claim 1, the internal controller (*e.g.*, microcontroller 400) is arranged to communicate over the second port (*e.g.*, port P2) with the further device (*e.g.*, device 70, 100 or 105) using a communications protocol. The protocol supports communication between the internal controller (*e.g.*, microcontroller 400) and any one of at least first and second different types of device for handling money. The first type of device handles money of a different type from those handled by the second type. In the example of FIGs. 1 and 2, the protocol allows the microcontroller 400 to communicate with coin change dispenser 105, bill validator 100 or card reader 70, which handle different types of money from one another.

In view of the foregoing, it should be clear that the "money handling device" is properly recited in the preamble, not the body of the claim.

It also should be clear that claim 1 does not specify whether the device for handling money (or the money handling apparatus) is one of the first or second types of device, or whether it is a third type of device. For example, in some implementations, the device for handling money could be a coin changer, and the first and second types could be a bill validator and another coin changer. In other implementations, the device for handling money could be a coin changer, and the first and second types could be a bill validator and a card reader. As explained in the specification:

According to one aspect of the present invention, the second port is connectable to any one of a number of different money handling units, and may implement a single standard interface for such a connection. An advantage of this arrangement is that, where the machine controller is not able to communicate directly with multiple different types of money handling unit, the first money handling unit according to this aspect of the invention provides the required connectivity instead.

In embodiments of the invention, the first money handling unit is a changer which validates and dispenses coins or tokens, while the second money handling unit may be a banknote validator, a card reader or a further changer, for example.

(Col. 1, lines 48-61)

Similar remarks are applicable to the other claims.

In view of the foregoing remarks, applicant respectfully requests withdrawal of the rejections of claims 1-6 and 24-25 as indefinite under section 112, par. 2.

(2) The Office action rejected claims 25, 27, 29, 31, 33 and 35 as indefinite under section 112, par. 2 because of the phrase “adapted for.” In view of the amendments to those claims, discussed above, applicant respectfully requests withdrawal of those rejections as well.

Rejections under 35 U.S.C. §102-103

The Office Action alleges that the components of the vending data collection system disclosed by the Partyka patent correspond to the claimed features as follows:

<u>Partyka patent</u>	<u>Claimed feature</u>
coin changer 12	money handling apparatus
machine unit 102	internal controller
location unit 104	external controller
banknote validator 14	further money handling device

Such an interpretation is incorrect for at least the reasons discussed below. Furthermore, the other cited references do not disclose the features missing from the Partyka patent. Applicant submits that, in view of the significant differences from the disclosure of Partyka patent, the Office action has not set forth a *prima facie* case of obviousness under section 103 even when taken together with the other references, and that there would have been no reason to lead a person of ordinary skill to obtain the claimed subject matter. Accordingly, applicant respectfully requests reconsideration and withdrawal of the rejections under sections 102 and 103.

Claim 1

(i) Claim 1 recites that the internal controller is for controlling the money handling apparatus. However, machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—is not capable of controlling coin changer 12, which allegedly corresponds to the claimed “money handling apparatus.”

Instead, the Partyka patent discloses that machine unit 102 monitors various signals in vending machine 10 to determine whether a vend has occurred (*see* FIG. 3; col. 5, line 66 – col. 6, line 8). Coin changer 12 clearly is not controlled by the machine unit 102.

(ii) Claim 1 recites that the internal controller is arranged to communicate over the second port with the further device for handling money. However, the machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—does not communicate with the bill validator 14 (which allegedly corresponds to the claimed “further money handling device”) over a port of the coin changer 12 (which allegedly corresponds to the claimed “device for handling money”).

Instead, the Partyka patent describes (col. 6, lines 3-6) that the machine unit 102 receives AC and DC inputs from vending machines 10. These inputs are further described, for example, in col. 5, lines 25-39, to include either qualifier and motor signals, or credit, motor and correct change signals. In any event, the Partyka patent does not disclose that signals are communicated between the bill validator 14 and the machine unit 102 (*see generally* col. 5, line 66 – col. 6, line 60).

(iii) Claim 1 recites that the communication protocol supports communication between the internal controller and any one of at least first and second different types of devices. However, the Partyka patent does not disclose a communications protocol that supports communication between the machine unit 102 and both the coin changer 12 and the bill validator 14.

As discussed above, the Partyka patent does not even suggest providing communications between machine unit 102 and the coin changer 12 *or* between machine unit 102 and the bill validator 14. Instead, as discussed above, the Partyka patent discloses that the machine unit 102 receives inputs from the vending machine such as qualifier, motor, credit and/or correct change signals. There is no indication that the machine unit 102 communicates with both the coin changer and the bill validator.

Furthermore, the Partyka patent relates to vending data collection systems, which provides for determining whether a vend has occurred. According to Partyka vends are detected indicating that products have been dispensed from the dispenser (*se, e.g.*, col. 2, lines 15-22). Passing signals between the machine unit 102 and coin changer 12 or bill validator 14 would not be suitable for indicating that products have been dispensed.

The Office action relies on the Capers and Taylor patents for other features (*e.g.*, detachable or removable connections; communications protocol). Those patents, however, do not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

At least for the foregoing reasons, applicant respectfully requests reconsideration and withdrawal of the rejections of claim 1.

Claim 7

(i) Claim 7 recites a method of communication for a money handling apparatus. The method includes “communicating with an external controller over a first port.” The Partyka patent, however, does not disclose communication between the coin changer 12 (which the Office action alleges corresponds to the claimed “money handling apparatus”) and the location unit 104 (which allegedly corresponds to the claimed “external controller”). Although the Partyka patent discloses communication between the location unit 104 and machine unit 102, the Partyka patent does not disclose any communication between those units and the coin changer 12.

(ii) The method of claim 7 also includes communicating with a further money handling apparatus over a second port by means of a second protocol “supporting communications with any one of at least first and second different types of device for handling money.” As discussed above, the Partyka patent does not disclose a communications protocol that supports

communication between the machine unit 102 and the coin changer 12 and the bill validator 14. Indeed, the machine unit 102 does not support communication with either the coin changer 12 or the bill validator 14.

The Office action relies on the Taylor patent for other features (*e.g.*, communications protocol). That patent, however, does not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

At least for the foregoing reasons, applicant respectfully requests reconsideration and withdrawal of the rejections of claims 7.

Claim 8

(i) Claim 8, like claim 1, recites a device for handling money that includes an internal controller for controlling a money handling apparatus. As already explained in connection with claim 1, machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—is not capable of controlling coin changer 12, which allegedly corresponds to the claimed “money handling apparatus.”

Instead, the Partyka patent discloses that machine unit 102 monitors various signals in vending machine 10 to determine whether a vend has occurred (*see* FIG. 3). Coin changer 12 clearly is not controlled by the machine unit 102.

(ii) Claim 8 also recites a second port for removable connection to a further device for handling money for communication with the internal controller. As explained above in connection with claim 1, the machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—does not communicate with the bill validator 14 (which allegedly corresponds to the claimed “further money handling device”) over a port of the coin changer 12 (which allegedly corresponds to the claimed “device for handling money”).

Instead, the Partyka patent describes (col. 6, lines 3-6) that the machine unit 102 receives AC and DC inputs from vending machines 10. These inputs are further described, for example, in col. 5, lines 25-39, to include either qualifier and motor signals, or credit, motor and correct change signals. In any event, the Partyka patent does not disclose that signals are communicated between the bill validator 14 and the machine unit 102 by way of the coin changer 12 (which allegedly corresponds to the claimed "device for handling money").

iii) Claim 8 further recites that the internal controller is arranged to copy the content of at least some signals "between the first port and the second port," where the first port is for connection to the external controller and the second port is for connection to the further device for handling money. The Partyka patent does not disclose such an arrangement.

In this regard, the Office action refers to FIG. 3 of the Partyka patent, which illustrates details of the machine unit 102 (which allegedly corresponds to the claimed "internal controller"). The machine unit 102 communicates signals received *from the vending machine* to location unit 104 (which allegedly corresponds to the claimed "external controller"). As discussed above, the signals from the vending machine relate to qualifier and motor signals, or credit, motor and correct change signals. Those signals are not communicated to or from the banknote validator 14 (which allegedly corresponds to the claimed "further money handling device"). Therefore, even if the machine unit 102 corresponds to the claimed "internal controller," the Partyka patent does not disclose that the internal controller is arranged "to copy the content of at least some signals between the first port and the second port" as recited in claim 8.

The Office action relies on the Capers patent for other features (*e.g.*, detachable or removable connections). That patent, however, does not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

At least for the foregoing reasons, applicant respectfully requests reconsideration and withdrawal of the rejection of claim 8.

Claim 14

(i) Claim 14, like claim 7, recites a method of communication for a money handling apparatus. The method includes “communicating with an external controller over a first port.” As explained above, the Partyka patent, however, does not disclose communication between the coin changer 12 (which the Office action alleges corresponds to the claimed “money handling apparatus”) and the location unit 104 (which allegedly corresponds to the claimed “external controller”). Although the Partyka patent discloses communication between the location unit 104 and machine unit 102, the Partyka patent does not disclose any communication between those units and the coin changer 12.

(ii) Claim 14 also recites that “the content of at least some signals is copied between” first and second ports, where the money handling apparatus communicates with an external controller over the first port and communicates with a further money handling apparatus over the second port.

As discussed above in connection with claim 8, the Partyka patent does not disclose that feature. In particular, according to the Partyka patent, the machine unit 102 (which allegedly corresponds to the claimed “internal controller”) communicates signals received from the vending machine to location unit 104 (which allegedly corresponds to the claimed “external controller”). The machine unit 201, however, is distinct from and does not communicate with the coin changer 12 (which allegedly corresponds to the claimed “money handling device”). Therefore, communications by the machine unit 102 are not a method of communication for “a money handling apparatus,” as recited in claim 14.

Furthermore, the signals from the vending machine that are communicated to the location unit 104 via the machine unit 102 relate to qualifier and motor signals, or credit, motor and correct change signals. Those signals are not communicated to or from the banknote validator 14

(which allegedly corresponds to the claimed “further money handling device”). Therefore, the disclosure of the Partyka patent that signals are communicated from the vending machine to the location unit 104 via the machine unit 102 does not satisfy the claim language of claim 14 that the content of at least some signals is copied between “said first and second ports . . .”

In view of the foregoing remarks, it should be clear that claim 14 is not anticipated by the Partyka patent.

Claim 15

(i) Claim 15, like claim 1, recites that the internal controller is for controlling the money handling apparatus. However, machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—is not capable of controlling coin changer 12, which allegedly corresponds to the claimed “money handling apparatus.”

Instead, the Partyka patent discloses that machine unit 102 monitors various signals in vending machine 10 to determine whether a vend has occurred (*see* FIG. 3; col. 5, line 66 – col. 6, line 8). Coin changer 12 clearly is not controlled by the machine unit 102.

(ii) Claim 15 also recites that the device for handling money has an internal controller arranged to convert between units of value for communications *over a first port* and units of value for communications *over a second port*. The first port is for connection to an external controller, and the second port is for connection to a further device for handling money.

According to the Partyka patent, the machine unit 102 (which allegedly corresponds to the claimed “device for handling money”) communicates signals received *from the vending machine* to location unit 104 (which allegedly corresponds to the claimed “external controller”). As discussed above, the signals from the vending machine relate to qualifier and motor signals, or credit, motor and correct change signals. Those signals are not communicated to or from the banknote validator 14 (which allegedly corresponds to the claimed “further money handling device”). Therefore, even if the machine unit 102 corresponds to the claimed “internal

controller," the Partyka patent does not disclose an internal controller arranged as recited in claim 15.

(iii) The Office action (at page 6) cites col. 6, lines 3-8, 17-25 and 54-60) of the Partyka patent as allegedly disclosing conversion between units of value for communications over the first port and units of value for communications over the second port. That is clearly incorrect.

Claim 15 recites converting between first "units of value" to second "units of value." Thus, the internal controller can convert, for example, between the denominations of currencies represented in the different protocols. An example in the pending application is explained as follows:

In one example, a bill validator arranged to receive and validate Euro banknotes is connected via the second port P2 to the changer 110, which is arranged to receive and dispense British Sterling coins. The smallest bill recognised by the validator is a five Euro note. and the validator outputs the value of a recognised bill to the second port P2 in units of five Euros. For example, if a twenty Euro bill is validated, a value byte will be output with a value of 4. The changer 130 accepts 5, 10, 20, 50 pence and .English Pound.1 coins, and outputs values over the first port P1 in units of 5 pence. The value of these units is set by a predetermined scaling factor SF, which scaling factor is stored within the controller 130.

For example, if a 50 pence coin is validated, this will be represented as 10 units. Hence, the units output by the changer 110 are not equal in value to the units output by the bill validator. The microcontroller 400 converts the units of the bill validator to those of the changer 110 by multiplying by a factor input by the operator. In this case, if the exchange rate for one Euro is 70 pence, the factor will be $1/70$ (approximately 0.014), since $5 \text{ Euros}/70=5 \text{ pence}$.

This factor is also used by the microcontroller 400 to convert commands including a value to the appropriate units. For example, to prevent acceptance of

bills greater than 5 Euros, the microcontroller 400 sends a command over the second port P2 indicating the maximum value to be accepted, and indicates the value as '1'. This command may be issued in response to a command from the controller 130 to limit the amount of accumulated credit to .English Pound.4 sterling. The microcontroller 400 infers from the value of the factor that the bill validator should not accept more than 5.71 Euros, which is rounded down to an integral number of units, in this case one unit

Although the Partyka patent mentions that a “credit” signal is among the AC and DC inputs from the vending machine to the machine unit 102 (col. 6, lines 3-5), neither the cited portions of the Partyka patent nor any other portion disclose the type of conversion recited in claim 15. Nor, as explained applicant’s response of October 6, 2006, does the Taylor patent disclose such conversion.

The Office action relies on the Capers patent for other features (*e.g.*, detachable or removable connections). That patent, however, does not disclose the features missing from the Partyka and Taylor patents and discussed in the preceding paragraphs.

Claim 19

(i) Claim 19 recites a method of communication for a money handling device. The method includes communicating with a further money handling device via a second port.

In contrast, as already explained above in connection with claim 1, the machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—does not communicate with the bill validator 14 (which allegedly corresponds to the claimed “further money handling device”) over a port of the coin changer 12 (which allegedly corresponds to the claimed “device for handling money”).

Instead, the Partyka patent describes (col. 6, lines 3-6) that the machine unit 102 receives AC and DC inputs from vending machines 10. These inputs are further described, for example, in col. 5, lines 25-39, to include either qualifier and motor signals, or credit, motor and correct

change signals. In any event, the Partyka patent does not disclose that signals are communicated between the bill validator 14 and the machine unit 102 (*see generally* col. 5, line 66 – col. 6, line 60).

ii) Furthermore, as discussed above in connection with claim 15, although the Partyka patent mentions that a “credit” signal is among the AC and DC inputs from the vending machine to the machine unit 102 (col. 6, lines 3-5), none of the cited references discloses the type of conversion recited in claim 19 (*i.e.*, “converting between first units of value used for communication over said first port and second units used for communication over said second port”).

Claim 20

(i) Claim 20, like claim 1, recites that the internal controller is for controlling the money handling apparatus. However, machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—is not capable of controlling coin changer 12, which allegedly corresponds to the claimed “money handling apparatus.”

Instead, the Partyka patent discloses that machine unit 102 monitors various signals in vending machine 10 to determine whether a vend has occurred (*see* FIG. 3; col. 5, line 66 – col. 6, line 8). Coin changer 12 clearly is not controlled by the machine unit 102.

(ii) Claim 20, like claim 1, also recites that the internal controller is arranged to communicate over the second port with the further device for handling money. However, the machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—does not communicate with the bill validator 14 (which allegedly corresponds to the claimed “further money handling device”) over a port of the coin changer 12 (which allegedly corresponds to the claimed “device for handling money”).

Instead, the Partyka patent describes (col. 6, lines 3-6) that the machine unit 102 receives AC and DC inputs from vending machines 10. These inputs are further described, for example,

in col. 5, lines 25-39, to include either qualifier and motor signals, or credit, motor and correct change signals. In any event, the Partyka patent does not disclose that signals are communicated between the bill validator 14 and the machine unit 102 (*see generally* col. 5, line 66 – col. 6, line 60).

(iii) Claim 20 further recites that the internal controller is arranged “to receive a code indicative of the type of the further device on the second port, and to output in response thereto on the first port an amended code representative to said external controller of a type different from that of the further device.”

In particular, the Partyka patent does not disclose that the machine unit 102 (which allegedly corresponds to the claimed “internal controller”) is arranged to receive a code indicative of the type of bill validator 14 (which allegedly corresponds to the claimed “further device for handling money”) and, in response, to output to the location unit 104 (which allegedly corresponds to the claimed “external controller”) an amended code representative of a type different from the bill validator 14.

The Office action relies on the Capers and Taylor patents for other features (*e.g.*, detachable or removable connections; communications protocol). Those patents, however, do not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

Claim 21

(i) Claim 21 recites a method of communication for a money handling device. The method includes “communicating with an external controller via a first port.” The Partyka patent, however, does not disclose communication between the coin changer 12 (which the Office action alleges corresponds to the claimed “money handling apparatus”) and the location unit 104 (which allegedly corresponds to the claimed “external controller”). Although the Partyka patent discloses communication between the location unit 104 and machine unit 102, the

Partyka patent does not disclose any communication between those units and the coin changer 12.

(ii) Furthermore, as discussed above in connection with claim 20, none of the references discloses receiving a code indicative of the type of the bill validator 14 (which allegedly corresponds to the claimed “further device”), and, in response, outputting to the location unit 104 (which allegedly corresponds to the claimed “external controller”) an amended code representative of a type different from that of the bill validator 14.

The Office action relies on the Capers and Taylor patents for other features (*e.g.*, detachable or removable connections; communications protocol). Those patents, however, do not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

Claim 22

(i) Claim 22, like claim 1, recites that the internal controller is for controlling the money handling apparatus. However, machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—is not capable of controlling coin changer 12, which allegedly corresponds to the claimed “money handling apparatus.”

Instead, the Partyka patent discloses that machine unit 102 monitors various signals in vending machine 10 to determine whether a vend has occurred (*see* FIG. 3; col. 5, line 66 – col. 6, line 8). Coin changer 12 clearly is not controlled by the machine unit 102.

(ii) Claim 22, like claim 1, also recites that the internal controller is arranged to communicate over the second port with the further device for handling money. However, the machine unit 102 in the Partyka patent—which the Office action alleges corresponds to the claimed “internal controller”—does not communicate with the bill validator 14 (which allegedly corresponds to the claimed “further money handling device”) over a port of the coin changer 12 (which allegedly corresponds to the claimed “device for handling money”).

Instead, the Partyka patent describes (col. 6, lines 3-6) that the machine unit 102 receives AC and DC inputs from vending machines 10. These inputs are further described, for example, in col. 5, lines 25-39, to include either qualifier and motor signals, or credit, motor and correct change signals. In any event, the Partyka patent does not disclose that signals are communicated between the bill validator 14 and the machine unit 102 (*see generally* col. 5, line 66 – col. 6, line 60).

(iii) Claim 22 further recites that the internal controller is arranged to detect to which first port the external controller is connected and to communicate with the external controller using a communications protocol selected according to the detected one of the first ports.

In contrast, the Partyka patent does not disclose that the machine unit 102 (which allegedly corresponds to the claimed internal controller”) is arranged *to detect* the port to which the location unit 104 (which allegedly corresponds to the claimed “external controller”) is connected and to communicate with the location unit 104 using a communications protocol selected according to the detected port.

The Office action relies on the Capers and Taylor patents for other features (*e.g.*, detachable or removable connections; communications protocol). Those patents, however, do not disclose the features missing from the Partyka patent and discussed in the preceding paragraphs.

Claim 23

Claim 23 recites a method of operating a money handling device. The method includes detecting to which port the external controller is connected and communicating with the external controller using a communications protocol selected according to the detected one of the ports.

As discussed above in connection with claim 22, the cited references do not disclose those features.

Dependent claims

The remaining claims depend, directly or indirectly from one of the independent claims discussed above. Each dependent claim should be allowable at least for the same reasons as those discussed in connection with the claim from which it depends.

Conclusion

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

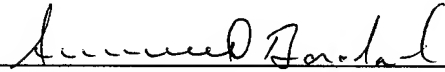
A check in the amount of \$600 is enclosed as payment for 12 new claims. Please apply any other charges or credits to deposit account 06-1050.

Applicant : Gregory John Billington et al.
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Respectfully submitted,

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